

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

RHONDA HALL,

Plaintiff,

V.

VERIZON COMMUNICATIONS, INC. and  
VERIZON NEW ENGLAND, INC.

Defendants.

CIVIL ACTION NO. 05-30002-MAP

MARCH 29, 2007

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE**  
**JOINT PRETRIAL MEMORANDUM**

Defendants, Verizon Communications, Inc. and Verizon New England, Inc. (“Verizon”), hereby move this Court for an additional two (2) days to file the Joint Pretrial Memorandum required by the Court in its January 26, 2007 Order in the above-captioned case. The Joint Pretrial Memorandum is currently due on March 29, 2007; Defendants request that the parties be permitted to file the Joint Memorandum on Monday, April 2, 2007.

Defendants make this request for a small amount of additional time because counsel for Defendants has been unable to confer with counsel for Plaintiff regarding the Pretrial Memorandum due to plaintiff's counsel's unavailability due to his travel schedule.

Defendants are not seeking a continuance or extension of the Pretrial Conference date, and are prepared to appear before the Court on April 5, 2007. Defendants have not sought on any prior occasion any extensions of this deadline.

For these reasons, Defendants respectfully move this Court for an extension of time of two (2) days to file the Joint Pretrial Memorandum.

Respectfully submitted,

**DEFENDANTS, VERIZON  
COMMUNICATIONS, INC. AND  
VERIZON NEW ENGLAND, INC.**

/s/ Stacy Smith Walsh

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 29, 2007, a copy of foregoing **Defendants' Motion for Extension of Time** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

By /s/ Stacy Smith Walsh

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